

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN SECTION

C.A. No. 1:04-CV-11217 PBS

EXPERIENCE HENDRIX, L.L.C., ET
AL.,

Plaintiffs,

v.

TANGRADI, INC.,

Defendant.

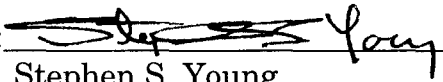
**PLAINTIFFS' MOTION
FOR DEFAULT JUDGMENT**

Plaintiffs, in accordance with Rule 55(b)(2) Fed.R.Civ.P., hereby move this Court to enter a default judgment against Defendant awarding Plaintiffs statutory damages and costs in the amount of \$9,200.00 in accordance with Plaintiffs' Motion for an Assessment of Damages, and an injunction prohibiting Defendant from performing without authorization, or permitting the unauthorized performance of, copyrighted musical compositions at the establishment known as Black Rock Tuscan Grille. As grounds for this motion, Plaintiffs say that the complaint contains four causes of action, in each of which Plaintiffs allege they are owners of copyrights in certain musical compositions and that Defendant gave a public performance of each such composition on its premises known as Black Rock Tuscan Grille during the evening of November 23 and early morning hours of November 24, 2003, and without the consent or approval of Plaintiffs, their agents or assignees.

The complaint in this case was filed on June 3, 2004, notice of default was sent to Defendant on September 17, 2004, and Defendant has failed to file an answer.

By their attorneys,

HOLLAND & KNIGHT LLP

By: 
Stephen S. Young
BBO #538040
10 St. James Avenue
Boston, MA 02116
(617) 523-2700

Dated: October 5, 2004

CERTIFICATE OF SERVICE

I, Stephen S. Young, hereby certify that on this 5th day of October, 2004, I served a copy of the Plaintiffs' Motion For Default Judgment upon the defendant by mailing a copy thereof, postage prepaid, addressed to: Tangradi, Inc., 633 Main Street, Yarmouth, MA 02673.

Signed under the pains and penalties of perjury.


Stephen S. Young

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